

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

SARAH MOLINA, et al.,)	
)	
Plaintiffs,)	
)	Case No.: 4:17-cv-2498 AGF
v.)	
)	
CITY OF ST. LOUIS, MISSOURI, et al.,)	
)	
Defendants.)	

PLAINTIFFS' FIRST SUPPLEMENTAL RULE 26(A)(1) DISCLOSURES

Plaintiffs respectfully submit the following first supplemental disclosures pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure:

A) Name of each individual likely to have discoverable information that Plaintiffs may use to support their claim of municipal liability based on the customs or policies of the City of St. Louis, through SLMPD, relating to the deployment of chemical munitions against protesters, observers of protests, and other pedestrians in violation of the First and Fourth Amendments:

1. Persons previously disclosed as part of Plaintiffs' and Defendant City of St. Louis' initial disclosures
2. Tony Able, current or former employee of Defendant.
3. Mustafa Abdullah, who may be contacted through counsel
4. Rasheen Aldridge, <https://www.facebook.com/Sheenbean32/>
6. Terez Barnes, 314-473-1251
7. Jerome Baumgartner, current or former employee of Defendant
8. Benjamin Bayless, current or former employee of Defendant
9. Joshua Becherer, current or former employee of Defendant

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10. Jesse Bogan, jbogan@post-dispatch.com
11. Scott Boyher, current or former employee of Defendant
12. Amir Brandy, 314-709-8405
13. Derk Brown, @DreadHead_46
14. Drew Burbridge, 816-719-3080
15. Jennifer Burbridge, 816-719-3080
16. Lawrence Bryant, lbfoto1@gmail.com
17. Tom Cinquina, address and telephone number unknown
18. Casey Cooper, 415-217-9168
19. Erin Counihan, 773-698-3362
20. Angela Coonce, current or former employee of Defendant
21. Custodian of Records, St. Louis Metropolitan Police Department
22. Emily Davis, etennilled@gmail.com
23. Michael Deebe, current or former employee of Defendant
24. Philip Deitch, 314-324-9198
25. Heather De Mian, @MissJupiter1957
26. Serg Payo Dominguez, 773-816-8864
27. Alison Dreith, 314-531-8616
28. Tabettha Esry, @tabesry
29. Mike Faulk, @Mike_Faulk
30. Rodney Ford, telephone number and address unknown
31. Bruce Franks Jr., 573-751-2383
32. Timothy Gardner, 314-369-6606
33. Danny Gladden, @dannygladden

34. William Douglas, current or former employee of Defendant
35. Maxi Glamour, @MaxiGlamour
36. Darryl Gray, 770-842-5210
37. Megan Green, 314-591-9587
38. Mark Gullet, address and telephone number unknown
39. Luther Hall, current or former employee of Defendant
40. Mike Hassel, 314-565-2332
41. Matt Heskamp, mattheskamp@gmail.com
42. Elise Miller Hoffman, elisemillerhoffman@gmail.com
43. Brandi Huffman, 314-210-1701
44. Schron Jackson, current or former employee of Defendant
45. Randy Jemerson, current or former employee of Defendant
46. Jeffrey Jensen, United States Attorney, and his staff
47. James Joyner, current or former employee of Defendant
48. Matthew Karnowski, current or former employee of Defendant
49. Nick Humphrey, current or former employee of Defendant
50. Dana Kelly-Franks, danakelly.franks@gmail.com
51. Calvin Kennedy, @calvinkennedy99
52. Derek Laney, 314-277-1589
53. Gerald Leyshock, current or former employee of Defendant
54. Pamela Lewczuk, pamschroell3@gmail.com
55. Sophie Lipman, selipman5@gmail.com
56. Marvin Malone, @kaleido_scopics
57. Will Millar, willmillar@gmail.com

- 58. Iris Maclean Nelson, irismaclean18@gmail.com
- 59. Alex Nelson, alexnelson15@gmail.com
- 60. Dillan Newbold, dillan.newbold@gmail.com
- 61. Thomas Noerper, tnoerper@yahoo.com
- 62. Scott Olson, telephone number and address unknown
- 63. Mario Ortega, <https://www.linkedin.com/in/mario-ortega-1678b737/>
- 64. Lawrence O'Toole, current or former employee of Defendant
- 65. Robert Patrick, rpatrick@post-dispatch.com
- 66. Mya Petty, address and telephone number unknown
- 67. Christine Powderly, current or former employee of Defendant
- 68. Tony Rice, 314-683-8254
- 69. Chris Robertson, address and telephone number unknown
- 70. Keith Rose, keithrose.ferguson@gmail.com
- 71. Brian Rossomanno, current or former employee of Defendant
- 72. Timothy Sachs, current or former employee of Defendant
- 73. Daniel Schulte, current or former employee of Defendant
- 74. Timothy Schumann, current or former employee of Defendant
- 75. Gregory Shanklin, 217-341-3490
- 76. Derrell Smith, Jr., address and telephone number unknown
- 77. Chris Sommers, chris@pi-pizza.com
- 78. Marissa Southards, <https://www.facebook.com/marissa.southards>
- 79. Ned Stevens, address and telephone number unknown
- 80. Alicia Street, 314-285-8003
- 81. Elyssa Sullivan, elyssa.sullivan@gmail.com

82. Demetrius Thomas, 618-741-9297
83. William Waldron, telephone number and address unknown
84. Jacob Walker, 314-596-1353
85. Aaron Webster, current or former employee of Defendant
86. Joshua Torres Wedding, oshwedding@gmail.com
87. Phillip Weeks, 314-750-2141
88. Nicole Warrington, 314-604-7276
89. Mark West, current or former employee of Defendant
90. Lindsey Wethington, current or former employee of Defendant
91. Kennard Williams, kennard@organizemo.org
92. Unknown Willis, current or former employee of Defendant
93. Brandon Wyms, current or former employee of Defendant
94. Karen Yang, 408-334-6420
95. Ben Zeno, 425-749-6974
96. Jon Ziegler, rebelutionaryz@gmail.com
97. Plaintiffs from *Templeton v. Dotson* and *Devereaux v. St. Louis County* et al.
98. Other police officers of the St. Louis Metropolitan Police Department,
including but not limited to the Civil Disobedience Team, SWAT Team, the
Bicycle Response Team, and the Internal Affairs Division

B) A general description by category and location of all documents, data compilations, and tangible things in the possession, custody, or control of Plaintiffs that the Plaintiffs may use to support their claim of municipal liability based on the customs or policies of the City of St. Louis, through SLMPD, relating to the deployment of chemical munitions against protesters, observers of protests, and other pedestrians in

violation of the First and Fourth Amendments:

1. All documents, video, and photographs submitted to the Court as part of proceedings related to the preliminary injunction in *Ahmad v. City of St. Louis*, 4:17-CV-2455

Respectfully submitted,

/s/ Jessie Steffan

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on August 23, 2018, a true and correct copy of the foregoing was served to counsel of record via electronic mail.

/s/ Jessie Steffan

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